

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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This document applies to:

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

ETHICON ELECTION WAVE (PTO 298)  
CASES LISTED IN PLAINTIFFS' NOTICE  
OF ADOPTION AT EXHIBIT A (Doc.  
7286)

**ETHICON DEFENDANTS' NOTICE OF ADOPTION OF WAVE 3 *DAUBERT*  
RESPONSE REGARDING NICOLETTE SIGRID HORBACH, M.D.,  
FOR ELECTION WAVE (PTO 298)**

Plaintiffs filed a Notice of Adoption as to the opinion testimony of Nicolette Sigrid Horbach, M.D., in the Election Wave (PTO 298) cases identified in Exhibit A to their Notice. *See* Doc. 7286. In response, Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general causation opinions of Nicolette Horbach, M.D. for Ethicon Wave 3 (Dkt. 2907) as their response for the Election Wave. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 3 response briefing.

Respectfully submitted,

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Counsel for Defendants Ethicon, Inc.,  
and Johnson & Johnson

**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
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